

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

**AVESHKA, INC.**

**Plaintiff,**

**v.**

**GLOBAL RECORD SYSTEMS, LLC**

**Defendant.**

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**Case No. 1:14-cv-01006 GBL-IDD**

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**DEFENDANT'S MOTION TO DISMISS  
OR, IN THE ALTERNATIVE, STAY COUNT III**

Defendant Global Record Systems, LLC, by counsel, pursuant to Fed. R. Civ. P. 12(b)(6) and the Court's inherent authority, hereby moves to dismiss, or in the alternative, stay, Count III of Plaintiff Aveshka, Inc.'s Complaint. Defendant incorporates herein in full its contemporaneously-filed Memorandum in Support of Motion to Dismiss or, in the Alternative, Stay Count III.

GLOBAL RECORD SYSTEMS, LLC  
by Counsel

/s/ Stephen D. Charnoff

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*Counsel for Defendant Global Record Systems, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of September, 2012, I will electronically file this pleading with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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